## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA Plaintiff

٧.

RAMON ENCARNACION-LLANOS DEFENDANT CRIM NO. 97-067(SEC)

## INFORMATIVE MOTION

TO THE HONORABLE SALVADOR E. CASELLAS: SENIOR U.S. DISTRICT COURT JUDGE

COMES NOW Mr. Ramon Encarnacion-LLanos, represented by the undersigned, and before this Honorable Court respectfully state and alleges as follows:

- 1. On November 13, 2007, this Honorable Court set the final revocation hearing for today at 11:00 am. Today, the government filed a motion for adjournment of the hearing because Mr. Encarnación was going to plea guilty to the same charges that prompted the motion for violations of his supervised release today.
- 2. At 10:00 am the undersigned called this Honorable Court's chambers and was informed that the Court had *denied* the government's request.
- 3. The undersigned appeared in Court today, only to find that the government's continuance was granted. The undersigned wishes to inform, that I was not called or any message left in my office (verified by my assistant) to inform of the granting of the motion. The undersigned is appointed under the CJA Panel to represent Mr.

Encarnación on his revocation hearing, and perhaps a phone call would have saved the CJA panel much needed funds.

WHEREFORE the appearing defendant for the reasons stated herein respectfully prays for this Honorable Court to acknowledge the present motion.

In San Juan, Puerto Rico, November 30, 2007.

Respectfully submitted,

s/Raymond l. Sánchez-Maceira

RAYMOND L. SANCHEZ MACEIRA USDC: 211405 # 361 CALLE DEL PARQUE MAGDALENA TOWER, SUITE 203 SANTURCE, P.R. 00912 TEL: (787) 721-3370/FAX: (787)721-4706

## CERTIFICATE OF SERVICE

I certify that on this day of filing the undersigned certifies that a copy of the instant pleading was filed using the court's CM/ECF electronic filing system that will send a copy to all counsel of record.

S/Raymond L. Sánchez-Maceira RAYMOND L. SANCHEZ MACEIRA USDC: 211405